



1300 I Street, N.W., Suite 400 West  
Washington, DC 20005

**Donald C. Brittingham**  
Director – Wireless/Spectrum Policy

November 29, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

**Re: *Ex Parte* Presentation  
WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

On November 28, 2005, Bill Pallone, President of Verizon Airfone, Leslie Owsley, Assistant General Counsel for Verizon, Mike Senkowski and Gregg Elias, both of Wiley Rein & Fielding and counsel to Airfone, and the undersigned met with Commissioner Michael Copps and his acting legal advisor, John Giusti, to discuss the above-captioned proceeding.

Airfone discussed AirCell’s proposal to terminate Airfone’s existing license in just two years. Airfone noted that the timeframe afforded by the Commission for converting its current system to broadband is already extremely tight given the technical and businesses issues associated with reconfiguring its current narrowband network and transforming the existing business to one that is focused on delivering broadband services. AirCell’s proposal, if adopted, would impose substantial burdens on Airfone and its customers, and would undermine competition, not promote it as AirCell claims. Given the significant demand for broadband services, Airfone urged the Commission to act expeditiously in finalizing its rules and moving to an auction as quickly as possible.

Pursuant to Section 1.1206(b)(2) of the Commission’s Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham  
Donald C. Brittingham

cc: Commissioner Michael Copps  
John Giusti